

**IN THE UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM)	
ALEXIS BOWLING)	
JENNA HOUSTON)	
JANE DOE #1)	CIVIL ACTION
)	
Plaintiffs)	No. 3:21-cv-00272
)	
v.)	JURY TRIAL DEMANDED
)	
LORIN ASHTON,)	JUDGE ALETA A. TRAUGER
AMORPHOUS MUSIC, INC.,)	
BASSNECTAR TOURING, INC.,)	STIPULATION
C3 PRESENTS, L.L.C.,)	
INTERACTIVE GIVING FUND,)	
GNARLOS INDUSTRIES, LLC,)	
CARLOS DONOHUE; ABC)	
CORPORATIONS, ONE THROUGH)	
TEN (said Names Being Fictitious),)	
JOHN DOES, ONE THROUGH TEN)	
(said Names Being Fictitious))	
)	
Defendants.)	

WHEREAS, all counsel to this action, during a meet and confer conference call held on May 17, 2021, agreed that, to the extent any defendant should file a Motion to Dismiss, that Plaintiffs would be permitted thirty (30) days to respond; and that any defendant would be permitted fourteen (14) days to file a reply to any opposition from the service of said opposition. Defendant Lorin Ashton (“Ashton”), on July 16, 2021, filed a Motion to Dismiss Count IV of the Plaintiff’s First Amended Complaint (“FAC”).

Pursuant to the agreement of all counsel, Plaintiffs shall file their opposition no later than

thirty (30) days from service of Defendant Ashton's Motion to Dismiss Plaintiff's FAC, or August 16, 2021; Defendant Ashton, may file a reply no later than fourteen (14) days from service of Plaintiffs' opposition.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the undersigned parties, that:

1. Plaintiff's response to Defendant Ashton's Motion to Dismiss Plaintiff's FAC shall be filed no later than August 16, 2021.

2. Defendant Ashton, may file a reply no later than fourteen (14) days from service of Plaintiffs' opposition.

3. This stipulation may be executed in counterparts, and a signature transmitted by electronic means shall be deemed an original for all purposes.

Dated:

RESPECTFULLY SUBMITTED:

/s/ Phillip Miller
Phillip Miller, Esquire
631 Woodland Street
Nashville, TN 37206
615-356-2000
pmiller@seriousinjury.com

/s/ Brian D. Kent
Brian D. Kent, Esquire
1100 Ludlow Street, Suite 300
Philadelphia, PA 19107
(215) 399-9255
bkent@lbk-law.com
Attorneys for Plaintiffs

/s/ Robert A. Peal
Robert A. Peal, Esquire
Mark W. Lenihan, Esquire
Grace A. Fox, Esquire
SIMS FUNK, PLC
3322 West End Ave., Suite 200
Nashville, TN 37203
(615) 292-9335
rpeal@simsfunk.com
mlenihan@simsfunk.com
gfox@simsfunk.com
*Attorneys for Defendants Amorphous Music,
Inc. and Bassnectar Touring, Inc.*

/s/ Kimberly S. Hodde
Kimberly S. Hodde, Esquire
HODDE & ASSOCIATES
40 Music Square East
Nashville, TN 37203

(615) 242-4200
kim.hodde@hoddelaw.com
*Attorney for Defendants Amorphous Music,
Inc. and Bassnectar Touring, Inc.*

/s/ Mitchell Schuster
Mitchell Schuster, Esquire
Stacy M. Ashby, Esquire
MEISTER, SEELIG & FEIN, LLP
125 Park Avenue, 7th Floor
New York, NY 10017
ms@msf-law.com
sma@msf-law.com
*Attorneys for Defendants Amorphous Music,
Inc. and Bassnectar Touring, Inc.*